

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF ROSEMARIE RIDDELL BOGDAN IN REPLY TO
DEFENDANTS' OPPOSITION TO PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE
THE OPINIONS OF DEFENSE EXPERT STEVEN W. BAERTSCHI, PH.D.**

Rosemarie Riddell Bogdan, hereby certifies as follows:

1. I am an attorney at law within the State of New York and a partner with the law firm of Harding Mazzotti, LLP and serve as Court-appointed Plaintiffs' Steering Committee Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in Reply to Defendants' Opposition to Plaintiffs' *Daubert* motion to preclude the opinions of defense expert Steven W. Baertschi, Ph.D.

2. Attached hereto as **Exhibit MM** is a true and accurate copy of ICH Q3B (R2), dated June 2, 2006.

3. Attached hereto as **Exhibit NN** is a true and accurate copy of [REDACTED]
[REDACTED]

4. Attached hereto as **Exhibit OO** is a true and accurate copy of [REDACTED]
[REDACTED]

5. Attached hereto as **Exhibit PP** is a true and accurate copy of [REDACTED]
[REDACTED]

6. Attached hereto as **Exhibit QQ** is a true and accurate copy of [REDACTED]

[REDACTED]

7. Attached hereto as **Exhibit RR** is a true and accurate copy of USP highlights-of-1469-nitrosamine impurities (pp. 1-5).

8. Attached hereto as **Exhibit SS** is a true and accurate copy of [REDACTED]

[REDACTED]

9. Attached hereto as **Exhibit TT** are true and accurate copies of excerpts of the examination before trial transcript of Stephen S. Hecht, Ph.D. dated 1-13-2023 (pp. 76, 294 - 296).

10. Attached hereto as **Exhibit UU** is a true and accurate copy of [REDACTED]

[REDACTED]

11. Attached hereto as **Exhibit VV** is a true and accurate copy of [REDACTED]

[REDACTED]).

Dated: April 25, 2023

Respectfully submitted,

/s/ Rosemarie Riddell Bogdan
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Rosemarie Riddell Bogdan

Rosemarie Riddell Bogdan